

UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
)
v.) CRIMINAL NO. 04-10164-DPW
)
)
SHON ROWELL)

DEFENDANT'S ASSENTED-TO MOTION TO CONTINUE SENTENCING HEARING

Defendant, Shon Rowell, respectfully moves that this Court continue his sentencing hearing, presently scheduled for November 8, 2005, to a date convenient to the Court but no earlier than November 28, 2005. As reasons therefore, defendant through counsel states the following:

1. The Presentence Report has been completed by the U.S. Probation Department and was served on counsel while counsel was in the midst of trial last week in United States v. Girard LaFortune, 03-10366-PBS.
3. Although this case features an agreed-upon sentence and thus defendant does not anticipate any substantive objections to the report, counsel has not yet had the opportunity to fully review the report with defendant.
4. Counsel's attention to this matter has recently been distracted by the hospitalization and declining health of his elderly father. Counsel's father passed away last Thursday, November 3, 2005 at Massachusetts General Hospital. Counsel is taking a leave of absence

during the week of November 7, 2005 in order to attend to details resulting from his father's death and to make living arrangements for his elderly mother.

5. Counsel is therefore requesting a brief continuance to accommodate this leave of absence and for counsel to meet with defendant to review the report.

SHON ROWELL,
By His Attorney:

/s/ Timothy Watkins
Timothy Watkins
B.B.O. #567992
Federal Defender Office
408 Atlantic Ave., Third Floor
Boston, MA 02110
(617) 223-8061